

## EXHIBIT C

IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

KEVIN SO,	)
	)
Plaintiff,	)
	)
VS.	) CASE NO.
	) CV 08-3336 DDP (AGRx)
LAND BASE, LLC; UNIVEST	)
FINANCIAL SERVICES, INC.;	)
BORIS LOPATIN, individually	)
and d/b/a BORIS LOPATIN	)
ASSOCIATES; CHARLES W.	)
WOODHEAD; KEVIN R. KONDAS,	)
KEITH MILLAR; KM & ASSOCIATES	)
INTERNATIONAL, LLC; KB&M	)
PROJECTS, INTERNATIONAL, LLC;	)
CTL PROJECTS INTERNATIONAL,	)
LLC; SUILKEE KIM a/k/a CAMERON	)
S. KIM; LUCY LU a/k/a LUCY	)
YAN a/k/a LUCY YAN LU a/k/a	)
YAN LU a/k/a YAN LUCY LU;	)
HENRY YANG; MIRA MELTZER;	)
JEFFREY M. MORITZ; and	)
LAURENCE GERSCHEL a/k/a	)
LAURENT GERSCHEL,	)
	)
and	)
	)
JOHN DOE DEFENDANTS 1-10	)
	)
Defendants.	)

Deposition of KEVIN SO, taken on  
behalf of the Defendants, at 1999  
Avenue of the Stars, Suite 400,  
Los Angeles, California, commencing at  
9:07 A.M., Friday, March 12, 2010,  
before Deanna Deremo, Certified  
Shorthand Reporter No. 13398.

1 do not testify. Just explain the issue; okay? 09:22

2 MS. TAN: Yeah. When you first asked, the  
3 interpreter didn't translate the term solicitor, and  
4 then later when she correct that into Chinese. Now,  
5 he thinks when you talk to me in English, solicitor 09:22  
6 do I understand? He said, "I don't understand," but  
7 he means he doesn't understand English.

8 MR. THIBODO: I appreciate you're trying  
9 to help, but please do not -- you're not permitted  
10 to testify about what Mr. So understands, or what he 09:22  
11 believes. All I'm trying to establish is he was  
12 represented by solicitors and barristers in the  
13 lawsuit in England.

14 MR. KALBIAN: Okay. We'll stipulate to  
15 that. 09:23

16 BY MR. THIBODO:

17 Q Okay. Very good. All right. Did the  
18 people -- the professionals, the attorneys, the  
19 solicitors and barristers who represented you in  
20 England -- did they provide you from time to time 09:23  
21 with Mandarin translations of written documents?

22 A I like to hear the rendition in Mandarin  
23 one more time. I don't recall.

24 Q Did you have an interpreter who  
25 accompanied you to England during the course of the 09:24

1 recover money from Mr. Brown? 10:36

2 A I don't understand the question. Could  
3 you repeat?

4 Q Did anyone ever tell you that the court in  
5 England ordered that you and Ms. Lu were to 10:37  
6 jointly -- any recovery against Mr. Brown, was to be  
7 paid to you and Ms. Lu together?

8 A I don't recall.

9 Q Did you recover proceeds from Michael  
10 Brown -- let me strike that. Did you recover any 10:38  
11 money from Michael Brown?

12 A Yes.

13 Q Did you pay any part of that money to Lucy  
14 Lu?

15 A No. 10:38

16 Q Did you recover money as a result of the  
17 sale of an aircraft?

18 A Yes.

19 Q Was any part of that money paid to Lucy  
20 Lu? 10:38

21 A No.

22 MR. THIBODO: I'd like to mark as Exhibit  
23 10, an October 14, 2007 letter from -- that's on  
24 Kalbian and Hagerty letterhead.

25 (Exhibit 10 was marked for identification.) 10:39

1 BY MR. THIBODO: 10:39

2 Q Mr. So, I'd like you to turn to the fifth  
3 page of this document, and tell me if that's your  
4 signature, please?

5 A Yes. 10:40

6 Q Did someone translate this document for  
7 you before you signed it, Mr. So?

8 A I don't recall.

9 Q Was Mr. Hagerty present when you signed  
10 this document, Mr. So? 10:41

11 A I don't recall.

12 Q Where -- next to your signature where it  
13 says 15 Oct, 2007, is that your handwriting, Mr. So?

14 A Yes.

15 Q You were in England when you signed this  
16 document; correct, Mr. So? 10:42

17 A During that time I believe so.

18 Q Yes. You testified in the UK in the  
19 English case against HSBC on October 15th, which is  
20 the date you signed this document; correct, Mr. So? 10:42

21 A I know it was around that time, but now, I  
22 don't know exactly what date.

23 Q This -- you testified -- the day you  
24 signed this document, Mr. So -- this engagement  
25 letter with Kalbian and Hagerty -- was the first day 10:43

1 you testified at trial in England; isn't that true? 10:43

2 A I only recall that I testified during that  
3 period, but I don't recall exactly what day I  
4 appeared in court to testify.

5 Q One of the reasons you retained Kalbian 10:44  
6 and Hagerty, Mr. So, was to assist you in connection  
7 with the case against HSBC in England; isn't that  
8 true?

9 A What happened at that time was that to  
10 retain -- the reason to retain Kalbian and Hagerty 10:46  
11 was because at that time Suchanek told me that  
12 another law firm would be needed to assist the case.  
13 And later on the attorney from Denver said -- well,  
14 what happened was Suchanek recommended an attorney  
15 from Denver -- but later on this attorney from 10:47  
16 Denver said, since Suchanek had already provided  
17 legal opinion to the British court, therefore,  
18 Suchanek would no longer be qualified to be my legal  
19 representative.

20 Therefore, Kalbian and Hagerty Law 10:47  
21 Firm was retained because Suchanek wanted to add a  
22 new law firm to assist, and Suchanek recommended  
23 Kalbian and Hagerty. Later on we learned from the  
24 attorney in Denver something. The attorney in  
25 Denver told us that the Denver attorney told 10:51

1 Suchanek that at that time Suchanek still wanted to 10:51  
2 represent Kevin So.

3 However, the Denver attorney said to  
4 Suchanek, "You had already provided letter of  
5 opinion to the British court. Therefore, you are no 10:51  
6 longer qualified to be a legal representative."  
7 Therefore, he didn't want to do it anymore. That's  
8 when we learned.

9 Q At the time of this letter --  
10 October 14th, 2007 -- Lucy Lu was also being 10:52  
11 represented by Kalbian and Hagerty; correct?

12 MR. KALBIAN: Object to the form of the  
13 question.

14 THE WITNESS: What was your question?

15 MR. THIBODO: Read back my question, 10:53  
16 please.

17 (The record was read back as requested.)

18 THE WITNESS: I don't know.

19 BY MR. THIBODO:

20 Q One of the things that Kalbian and Hagerty 10:53  
21 was retained to represent you with was litigation of  
22 a lawsuit in the southern -- in the U.S. District  
23 Court for the Southern District of New York; is that  
24 correct, Mr. So?

25 A Many cases were initiated by Suchanek. I 10:54

1           **A**     In the beginning I learned that she was an                         15:54  
2     assistant to Suchanek.

3 Q Have you ever met Mira Meltzer?

4                   A       Yes.

5 Q In person? 15:54

6 | A Yes.

7	Q	When?
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8           **A**     The end of last year.

9 Q Where?

10	<b>A</b> In the courtroom in Washington, D.C.	15:55
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11 Q Is that the only time you have met

12 Mrs. Meltzer in person?

13           **A**     This is all I can think of right now.

14 Q When you met Mrs. Meltzer at the courtroom  
15 in D.C., was that part of the lawsuit against the 15:55  
16 judge?

17                    **A**       Yes.

18 Q Did you two speak at that time?

19           **A**    No, not during that time.

20 Q Have you ever spoken personally with Mira 15:56  
21 Meltzer?

22 MR. KALBIAN: In person? Is that the  
23 question?

24 MR. BEAUDOIN: In person.

25 MR. KALBIAN: Thank you. 15:56

1 THE WITNESS: In person, no. 15:57

2 BY MR. BEAUDOIN:

3 Q Have you ever known Mira Meltzer in any  
4 capacity other than Judge Suchanek's assistant?

5 MR. KALBIAN: Objection to form. You can 15:57  
6 answer.

7 THE WITNESS: I don't understand the  
8 question.

9 BY MR. BEAUDOIN:

10 Q You understood Mira Meltzer was the 15:58  
11 Judge's assistant; correct?

12 A Yes.

13 Q To your knowledge did Mira Meltzer have  
14 any other profession?

15 A She is a key manager at KM & A Company. 15:58

16 Q Do you have any understanding as to what  
17 KM & A Company does?

18 MR. KALBIAN: I would caution you the same  
19 way I cautioned you earlier. If the sole basis of  
20 your knowledge to answer that question is 15:59  
21 information that you learned from Counsel, I'd  
22 instruct you not to answer. But if you have any  
23 knowledge that's independent of that, you may  
24 answer.

25 THE WITNESS: My information came from my 16:00

1 attorneys. 16:00

2 BY MR. BEAUDOIN:

3 Q Have you ever emailed Mira Meltzer?

4 A Yes, I have.

5 Q On those occasions that you emailed Mira 16:00

6 Meltzer, did you have somebody assist you in

7 translating your email into English?

8 A Yes.

9 Q Would the same person help you translate  
10 your emails to Mira Meltzer every time that you 16:01

11 emailed her?

12 A No.

13 Q Which people assisted you in translating  
14 your emails to Mira Meltzer?

15 A My partner, Wang Birui, has done that, and 16:02  
16 some other interpreters have done that.

17 Q Can you recall the names of any of these  
18 other interpreters?

19 A I am not able to think of the names right  
20 now because it's not always the same one. 16:02

21 Q Have you ever discussed the Private  
22 Placement Project -- strike that. Have you ever  
23 discussed the Michael Brown Project with Mira  
24 Meltzer?

25 MR. KALBIAN: Objection. Are you defining 16:03

1 THE WITNESS: About the 30 million 16:06  
2 investment in England, Suchanek was my attorney, and  
3 Mira was Suchanek's assistant. Therefore, Mira  
4 Meltzer was quite familiar with the investment  
5 information. 16:06

6 BY MR. BEAUDOIN:

7 Q Accepted. Did Mira Meltzer ever give you  
8 investment advice?

9 A I don't recall.

10 Q Did Mira Meltzer ever advise you as to 16:07  
11 whether you should invest money with Michael Brown?

12 A I don't recall.

13 Q Do you recall if Mira Meltzer ever advised  
14 you to do business with Land Base?

15 A In 2007, Mira took the initiative to put 16:10  
16 people from Land Base to be in touch with me.

17 Several times in early part of 2007, Mira put people  
18 from Land Base -- Boris Lopatin, Woodhead, and

19 Kim -- tried several times to send them to Hong Kong  
20 to meet with me. When Boris Lopatin, Woodhead and 16:10

21 Cameron were in Hong Kong, they introduced me to a  
22 lot of their projects. Some had already been

23 successfully completed, and some were about to  
24 start.

25 Those projects include many projects 16:12

1 that they -- many projects that would take place in 16:12  
2 Thailand, a city that they were going to build, and  
3 also oil tube connecting Thailand to China and many  
4 projects in Europe. They were also talking about  
5 purchasing a big office building for their office in 16:12  
6 Hong Kong.

7 During the time I was meeting with  
8 people from Land Base, Cameron told me that the  
9 telephone they were receiving or calling out were  
10 phone calls with Suchanek and Mira Meltzer. Just by 16:14  
11 observing their expression, they all seemed to be  
12 very happy on the phone, talking. In addition  
13 Cameron also told me that Suchanek is a very  
14 powerful person. One time Cameron accidentally  
15 called him by his first name. For that Suchanek was 16:15  
16 upset with Cameron for a long time and --

17 MR. BEAUDOIN: I need to cut in here. My  
18 question was has Mira Meltzer ever advised you to do  
19 business with Land Base? I'm not hearing a  
20 response. We're talking about somebody named 16:15  
21 Cameron calling the judge by his name.

22 MR. KALBIAN: Who was with Boris  
23 Lopatin -- I think was his testimony -- who was Land  
24 Base. He's giving you the answer. You may not like  
25 the answer, but that's not a reason to cut in. 16:16

1 arrange time to meet with us. 16:30

2 And that went on for one year. So my  
3 understanding is for one year Boris Lopatin didn't  
4 have time to come to meet with us. So finally when  
5 Boris Lopatin had the time to come to meet with us, 16:30  
6 I was happy thinking that he would tell us more  
7 about the litigation. I never anticipated that he  
8 came over here wanting to talk to us about the  
9 projects.

10 Q Is it your understanding that you have 16:31  
11 sued Mira Meltzer in this lawsuit?

12 A Yes.

13 Q Why have you sued Mira Meltzer?

14 A That's because Mira Meltzer is a key  
15 manager at KM & A Company. I invested 30 million 16:32  
16 principal in the investment, and the so-called  
17 profit by those cohorts were taken away by KM & A  
18 Company. Mira being a key manager of KM & A, she  
19 benefited from that money.

20 Q Has Mira Meltzer in your opinion ever lied 16:33  
21 to you?

22 MR. KALBIAN: Objection to form. Also  
23 calls for speculation.

24 THE WITNESS: I don't want to speculate.

25 ///// 16:33

